

# **Arizona Department of Agriculture**

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#### **APPROVED**

# MINUTES OF PUBLIC MEETING OF THE ARIZONA LEAFY GREEN PRODUCTS SHIPPER MARKETING AGREEMENT **TECHNICAL SUBCOMMITTEE** MEETING HELD APRIL 9, 2009

A public meeting of The Arizona Leafy Green Products Shipper Marketing Agreement Technical Subcommittee was held at Dole Fresh Vegetables, 3725 South Avenue 3E in Yuma, Arizona on April 9, 2009 at 1 pm. Pursuant to A.R.S. § 38-431.02, notice of the meeting was duly posted and members of The Arizona Leafy Green Products Shipper Marketing Agreement, Arizona's agricultural community and the general public were advised of the meeting and invited to attend. These minutes were not transcribed verbatim.

Committee members present: Vicki Scott, Arnott Duncan (Telephonically), Hank Giclas (Telephonically), Kami Weddle, Kevin Watson and Tom Mack (Telephonically) Absent: Bob Mills

Department staff present: Ed Foster, Gary Rochester, Teressa Lopez and Dr. John Hunt

Others present: Jonathan Field, Paradigm; Valentin Q. Sierra, Ocean Mist Farms; Mike Pasquinelli, Nature Fresh Farms; Robert Pasquinelli, Pasquinelli Produce Co.; Edgar A. Galavia, Foothill Packing, Inc.

## 1. Call to Order

Ms. Scott called the meeting to order at 1:05pm.

#### 2 Roll Call

Ms. Lopez called the roll and determined that a quorum was present.

#### Approval of Minutes

Ms. Scott called for discussion or approval of the February 19, 2009 minutes. Ms. Lopez informed that the current agenda that item 3 was a typo and should read "Approval of Minutes of February 19, 2009 Meeting".

MOTION: Kevin Watson moved Kami Weddle seconded to approve the February 19, 2009 minutes. Motion carried unanimously.

# 4. <u>Update on Arizona Leafy Green Shipper Marketing Agreement Marketing Committee</u>

Ms. Scott informed that the Marketing Committee sent out a Press Release regarding the AZ LGMA and some of its goals, along with a letter in the Arizona Capital Times to help keep legislators informed so they are less likely to sweep AZ LGMA funds.

# 5. Study Session on Outreach Session

## Future Metrics Training and Resources

Ms. Scott informed that there were approximately 27 participants in the Outreach Session. Ms. Scott informed that as the subcommittee will see in Mr. Field's preliminary review, there is a need for training that goes beyond the Outreach Sessions. The committee has a whole agreed that "Train the Trainer" and work groups would have a larger impact than the Outreach sessions. Discussion continued on possible types of training available.

**MOTION:** Arnott Duncan moved Kevin Watson seconded to recommend that the Marketing Committee develop a budget for a training program and training resources. Motion carried unanimously.

Ms. Scott stated there was a one question from the Outreach Session; they wanted to know the "Letter of Guarantee" should look like and if we could provide a sample. Mr. Field stated that the Metrics list all of the requirements and at one point Mr. Scott Horsfall set out a template. Discussion continued.

## 6. Jonathan Field update on Audit Review

Mr. Jonathan Field updated the subcommittee on season with regard to compliance audit review. He informed that there were 100, in which 28 audits were clean, meaning there were no deviations. There was 1 flagrant violation for spitting in the field which led to a decertification, and 7 major deviations. One of which was for falsification of records, it was written up as a flagrant violation, then given to the Marketing Committee their recommendation and the decision was made to change it to a major deviation and the shipper was then audited within three days. There were approximately 100 minor deviations about 58 minor

infractions, understandable the areas that had the most levels of deviations have to do with the field harvest practices with about a third the same as in last year in California, about 35-45% problems are in the field harvest practices, which includes all sanitary units, harvest crews and hand washing. Mr. Fields continued to review and discuss the following document.

#### AZ LGMA Compliance Results 2008-09 Violation FI, Mjd, Handler (Signatory) Clean Mnd. Mi Compliance Section (s) (QÍW Min. Dev. (MnD) WUSE Min. Infr. (Mif) PLE GR NCT 뽀 E Approximately EA SA 교 ≥ P Maj. 100 audits completed TOTALS 7 7 5 23 101 58 25 41 0 0 61 0 0 (Preliminary) Common Deviations: In appropriate location of sanitary units General Requirements (GR) (proximity to harvest area and field workers/harvest crews) No Sop's Knife and glove sanitation Jewelry, cell SOP's incomplete phones, on worker Traceback programs not well defined No visitor policy Environmental Assessments (EA) USDA/LGMA (SERIOUS) Assessments incomplete No ranch name, name of person filling out Feces (any feces) observed in or report, date, etc. around the field or harvest area and failure to flag/remove/ properly Water (W) dispose Spitting (bodily fluids) in harvested or No source water test within 60 days of first use No test of distribution closest to the point of use Failure to wash hands after breaks No logs, pH testing for post harvest water use and before starting work Ranch maps do not indicate location of water Soiled toilet paper not in proper tests, wells, spigots, etc. receptacle (USDA does not include trash cans as proper receptacles) Soil Amendments (SA) Falsification of a record · Inadequate documentation, auditors cannot link Other issues: • Auditor's tests to applications in field purpose is to verify the documented actions of the handlers and growers. Al action should be Incomplete test results No water tests for water used in herbicides. documented, even the most trivial synthetics, etc When flagging areas for non harvest, destroy the product while the auditor is Harvest Equipment-Field Sanitation (HE) present whenever possible No cleaning logs Containers not marked appropriately Containers not used for intended purpose Field Harvests Personnel (FHP) Leaks and spills (also for harvest equipment) · Failure to sanitize knives, gloves

Mr. Mack stated that he was not surprised by the results.

## LGMA Metric changes / Micro Swabbing/pH testing

Mr. Field informed that California Department of Food and Agriculture Auditors, Hank Giclas with Western Growers Associations, the western territories Federal Program Manager, Mr. Tony Sousa and himself met in Salina, CA in February 2009 to discuss issues with the inspection programs and the metrics in California and Arizona.

Mr. Field informed that the meeting covered the requirement of a "Letter of Guarantee" on validation authority for Soil Amendments, Blue Valve/Purple Valve, water testing's and well water exemptions with monthly requirement of five tests with at least 18 hours apart and some of the intent, data to support municipal water and exemptions that are obtained on the county

websites, consensus to eliminate the language on swabbing harvest equipment. Mr. Mack asked if it was hand harvesting equipment and Mr. Field stated it is on field harvest equipment that does include some hand harvest equipment. Mr. Field clarified that when harvesters are washed it can create a cross contamination issue, and you are not precluded from swabbing. Mr. Field informed that the Metrics states swabbing or other acceptable techniques, so USDA believes that swabbing should be eliminated from the Metrics, not to preclude shippers from swabbing but to make the Metrics a solid document. Mr. Field added that the shippers will still need to have equipment cleaning logs. Mr. Field stated that there will be section added to the metrics for Daily Harvest Assessment Requirements. Mr. Field stated that there will be additional information on the buffering and flagging to cover spitting and bodily fluids in the field. USDA had some issue on the assignment of deviation levels so language will be added in that regard. UDSA's definition of hand washing is basically soap and water must be used to constitute hand washing. Mr. Field directed the subcommittee's attention to the following handouts:

## **HANDOUT 1**

## 8. <u>Issue: Harvest Equipment (Field Sanitation)</u>

This section addresses harvest and harvest aid equipment used for lettuce/leafy greens. Mechanical or machine harvest has become increasingly prevalent and provides opportunity for increased surface contact exposure. This includes field cored lettuce operations that use various harvest equipment and aids.

#### 8.1 The Best Practices Are:

- Prepare an SOP for harvest equipment that addresses the following:
  - Sanitation verification
  - Daily inspection
  - Proper cleaning, sanitation and storage of hand harvest equipment (knives, scythes, etc.)

Control procedures when equipment is not in use, including policy for removal of equipment from the work area or site and the use of scabbards, sheathes or other storage equipment.

- · Prepare an SOP for handling and storage of product containers that addresses the following:
  - Over night storage
  - Contact with the ground
  - o Container assembly (RPC, fiber bin, plastic bin, etc)
  - Damaged containers
  - o Use of containers only as intended
- Prepare an SOP for sanitary operation of equipment which addresses:
  - Spills and leaks
  - o Inoperative water sprays
  - Exclusion of foreign objects (including glass, plastic, metal and other debris)
  - o Establish and implement cleaning and sanitation schedules for containers and equipment that will be used in hydration.
  - Maintain logs documenting cleaning and sanitation, and retain these records for at least two years.
  - Establish policies for the storage and control of water tanks and equipment used for hydration operations when not in use.
- Establish appropriate measures that reduce and control the potential introduction of human pathogens at the cut surface during and after mechanical
  harvest operations. Due to the cut surface being more vulnerable to microbial contamination, this best practice is extremely important and all practical
  means should be taken to reduce the possibility of introduction of contamination at this process step.
- If re-circulated rinse or antioxidant solutions are used on the cut surface, take all practicable precautions to prevent them from becoming a source of
  contamination.

**Deleted:** <#>Periodic microbial swabs or other equivalent indicator¶

- Design equipment to facilitate cleaning by using materials and construction that facilitate cleaning and sanitation of equipment food contact surfaces (e.g., transportation tarps, conveyor belts, etc.).
- Establish the frequency of equipment cleaning and sanitation by developing Sanitation Standard Operating Procedures (SSOPs) and a sanitation schedule for machine harvest operations.
- Evaluate the use of cleaning verification methods for harvesting equipment (e.g., ATP test methods).
- . Locate equipment cleaning and sanitizing operations away from product and other equipment to reduce the potential for cross contamination.
- Establish equipment storage and control procedures to minimize the potential for contamination when not in use. Establish policies and sanitary design
  options that facilitate frequent and thorough cleaning and sanitizing of food contact surfaces.
- Develop and implement appropriate cleaning, sanitizing, storage and handling procedures of all food contact surfaces to reduce and control the potential for microbial cross contamination.
- Allow adequate distance for the turning and manipulation of harvest equipment to prevent cross contamination from areas of animal of significant risk intrusion or adjacent land that may pose a risk.

# **HANDOUT 2**

#### 1. Issue: Water

Water used for production and harvest operations may contaminate lettuce and leafy greens if water containing human pathogens comes in direct contact with the edible portions of lettuce/leafy greens. Contamination may also occur by means of water-to-soil followed by soil-to-lettuce/leafy greens contact. Irrigation methods may have varying potential to introduce human pathogens or promote human pathogen growth on lettuce and leafy greens (Stine et al., 2005).

There are several different approaches and values that can be utilized to ensure that water is of appropriate quality for its intended use. The metrics applied in this edition of the Commodity Specific Guidance should be considered a starting point in industry efforts to continuously improve the quality of water used in production of these commodities.

The current metrics are intended to provide standards associated with water uses; however, it is known that various water sources have different microbial qualities, and each source should be monitored accordingly. Typical microbial values associated with various sources can be found in the Sanitary Survey document (Appendix A). During the sanitary survey that is performed prior to each growing season expected microbial values and historical monitoring data should be used to evaluate the quality of the water source.

#### 1.1 The Best Practices Are:

- A water system description shall be prepared. This description can use maps, photographs, drawings or other means to communicate the location of
  permanent fixtures and the flow of the water system (including any water captured for re-use.). Permanent fixtures include wells, gates, reservoirs,
  valves, returns and other above ground features that make up a complete irrigation system should be documented in such a manner as to enable
  location in the field. Water sources and the production blocks they may serve should be documented.
- Water systems that convey untreated human or animal waste must be separated from conveyances utilized to deliver irrigation water.
- Use irrigation water and water in harvest operations that is of appropriate microbial quality for its intended use; see Table 1 and Decision Trees (1A, 1B and 1C) for specific numerical criteria. Appendix B provides the basis for these water quality metrics.
- Perform a sanitary survey prior to use of water in agricultural operations and if water quality microbial tests are at levels that exceed the numerical
  values set forth in Table 1. The sanitary survey is described in <u>Appendix A</u>.
- Test water as close to the point-of-use as practical, and if microbial levels are above specific action levels, take appropriate remedial and corrective
  actions.
- Retain documentation of all test results and/or Certificates of Analysis available for inspection for a period of at least 2 years.

## Other Considerations for water

- Evaluate irrigation methods (drip irrigation, overhead sprinkler, furrow, etc.) for their potential to introduce, support or promote the growth of
  human pathogens on lettuce and leafy greens. Consider such factors as the potential for depositing soil on the crop, presence of pooled or
  standing water that attracts animals, etc.
- When waters from various sources are combined, consider the potential for pathogen growth in the water.
- For surface water sources, consider the impact of storm events on irrigation practices. Bacterial loads in surface water are generally much higher
  after a storm than normal, and caution shall be exercised when using these waters for irrigation.

 Use procedures for storing irrigation pipes and drip tape that reduce or eliminate potential pest infestations. Develop procedures to provide for microbiologically safe use of irrigation pipes and drip tape if a pest infestation does occur.

Reclaimed water shall be subject to applicable state and federal regulations and standards. Use of this water for agricultural purposes must meet the most stringent standard as defined by the following: state and federal regulation or Table 1 of this document. Water sample results and analysis provided by the water district or provider may be utilized as records of water source testing for verification and validation audits

TABLE 1. V			
Use	Metric	Rationale /Remedial Actions	
PREHARVEST	Target Organism:	For any given water source (municipal, well, reclaimed water, reservoir or other surface water), samples	
Foliar Applications	generic E. coli.	for microbial testing shall be taken at a point as close to the point of use as practical (as determined by the	
Whereby Edible Portions of the Crop	Sampling Procedure:	sampler, to ensure the integrity of the sample, using sampling methods as prescribed in Table 1) where the water contacts the crop, so as to test both the water source and the water distribution system. In a	
ARE Contacted by	100 mL sample collected aseptically at	closed water system (meaning no connection to the outside) water samples may be collected from any	
Water	the point of use; i.e., one sprinkler head	point within the system but are still preferred as close to point of use as practical. No less than one sample	
waldi	per water source for irrigation, water tap	per month per distribution system is required under these metrics unless a system has qualified for an	
(s.g. overhead	for pesticides, etc. Water utilized in	exemption. If there are multiple potential point-of-use sampling points in a distribution system, then	
sprinkler irrigation,	preseason irrigation operations may be	samples shall be taken from different point-of-use locations each subsequent month (randomize or rotate	
pesticides/fungicide	tested and utilized.	sample locations).	
application, etc.)			
	Sampling Frequency:	Water for preharvest, direct edible portion contact shall meet or exceed microbial standards for	
	One sample per water source shall be	recreational water, based on a rolling geometric mean of the five most recent samples. However, a rolling	
	collected and tested prior to use if >60	geometric mean of five samples is not necessarily required prior to irrigation or harvest. If less than five	
	days since last test of the water source.	samples are collected prior to irrigation, the acceptance criteria depends on the number of samples taken.	
	Additional samples shall be collected no less than 18 hr apart and at least monthly	If only one sample has been taken, it must be below 126 CFU/100 mL. Once two samples are taken, a geometric mean can be calculated and the normal acceptance criteria apply. If the acceptance criteria are	
		geometric mean can be calculated and the normal acceptance criteria apply. If the acceptance criteria are exceeded during this time period, additional samples may be collected to reach a 5 sample rolling	
	during use from points within the distribution system.	geometric mean (as long as the water has not been used for irrigation). The rolling geometric mean	
	distribution system.	calculation starts after 5 samples have been collected. If the water source has not been tested in the past	
	Municipal & Well Exemption:	60 days, the first water sample shall be tested prior to use, to avoid using a contaminated water source.	
	For wells and municipal water sources,	After the first sample is shown to be within acceptance criteria, subsequent samples shall be collected no	
	if generic E. coli are below detection	less frequently than monthly at points of use within the distribution system.	
	limits for five consecutive samples, the		
	sampling frequency may be decreased to	Ideally, preharvest water should not contain generic E. coli, but low levels do not necessarily indicate that	
	no less than once every 180 days and the	the water is unsafe. Investigation and/or remedial action SHOULD be taken when test results are higher	
	requirements for 60 and monthly	than normal, or indicate an upward trend. Investigation and remedial action SHALL be taken when	
	sampling are waived. Closed systems	acceptance criteria are exceeded.	
	with records to demonstrate that all	n 1144 100 n	
	samples of generic E. coli are below detection limits for the two preceding	Remedial Actions: If the rolling geometric mean (n=5) or any one sample exceeds the acceptance	
	seasons may decrease sampling to a	criteria, then the water shall not be used whereby edible portions of the crop are contacted by water until remedial actions have been completed and generic E. coli levels are within acceptance criteria:	
	single sample per season. This	Conduct a sanitary survey of water source and distribution system to determine if a contamination	
	enemption is void if there is a significant	source is evident and can be eliminated. Eliminate identified contamination source(s).	
	source or distribution system change.	For wells, perform a sanitary survey and/or treat as described in Appendix A Sanitary Survey.	
		Retest the water after conducting the sanitary survey and/or taking remedial actions to determine if it	
		meets the outlined microbial acceptance criteria for this use. This sample should represent the	
		conditions of the original water system, if feasible this test should be as close as practical to the	7
		original sampling point. A more aggressive sampling program (i.e., sampling once per week instead.	
	Test Method:		
	15 tube MPN (FDA BAM) or other U.S.	original sampling point. A more aggressive sampling program (i.e., sampling once per week instead of once) shall be instituted if an explanation for the exceedence is not readily apparent. This type of	
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# **HANDOUT 3**

## 1. <u>Issue:</u> Environmental Assessments

This section addresses assessments that shall be completed prior to the first seasonal planting, within one week prior to harvesting and during harvest operations. These environmental assessments are intended to identify any issues related to the produce field, adjacent land uses, or intrusion by animal of significant risk (see Table 5) that might impact produce safety.

#### 1.1 The Best Practices Are:

- Prior to the first seasonal planting and within one week prior to harvest, perform an environmental assessment of the production field and surrounding
  area. Focus these assessments on evaluating the production field for possible animal of significant risk intrusion or other sources of human pathogens
  of concern, assessing adjacent land uses for possible sources that might contaminate the production field, and evaluating nearby water sources for the
  potential of past or present flooding.
  - o Assessment of Produce Field
    - Evaluate all produce fields for evidence of animal of significant risk intrusion and/or feces. If any evidence is found, follow
      procedures identified in the "Production Locations Encroachment by Animals and Urban Settings."
  - Assessment of Adjacent Land Use
    - Evaluate all land and waterways adjacent to all production fields for possible sources of human pathogen of concern. These
      sources include, but are not limited to, manure storage, compost storage, CAFO's, grazing/open range areas, surface water,
      sanitary facilities, and composting operations (see Table 6 for further detail). If any possible uses that might result in produce
      contamination are present, follow management practices identified in the sections below related to environmental and land use
      concerns.
  - Assessment of Historical Land Use
    - To the degree practical, determine and document the historical land uses for production fields and any potential issues from these
      uses that might impact food safety (i.e., hazardous waste sites, landfills, etc.).
  - Assessment of Flooding
    - Evaluate all produce fields for evidence of flooding. If any evidence is found, follow procedures identified in the "Flooding" section below
- During each day of harvest, perform an environmental assessment of the production field and surrounding area. The following issues should be the
  focus of the daily harvest assessments.
  - Assessment of Produce Field
    - Evaluate all produce fields for evidence of animal of significant risk intrusion and/or feces. If any evidence is found, follow procedures identified in the "Production Locations – Encroachment by Animals and Urban Settings."
  - Assessment of Adjacent Land Use
    - Survey adjacent land uses for evidence that changes have occurred since the pre-harvest environmental assessment. If any
      possible uses that might result in produce contamination are present, follow management practices identified in the sections
      below related to environmental and land use concerns.
  - Assessment of Flooding
    - Survey production field for evidence that flooding has occurred since the pre-harvest environmental assessment. If any evidence
      is found, follow procedures identified in the "Flooding" section below.
  - Assessment of Worker Practices
    - EVALUATE WHETHER THE WORKER HEALTH AND FIELD/EQUIPMENT SANITATION PRACTICES AS OUTLINED IN THE "HARVEST EQUIPMENT (FIELD SANITATION)," "HARVEST PERSONNEL – DIRECT CONTACT WITH SOIL DURING HARVEST (FIELD SANITATION)," "FIELD AND HARVEST PERSONNEL – TRANSFER OF HUMAN PATHOGENS BY WORKERS (FIELD SANITATION)," AND "EQUIPMENT FACILITATED CROSS CONTAMINATION (FIELD SANITATION)" SECTIONS ARE BEING PROPERLY FOLLOWED.
    - In particular, ensure the following practices are followed:
      - No eating, chewing, or smoking in crop production areas.
      - Workers properly wash hands after bathroom and other breaks prior to returning to the field, and sanitary facilities are functioning properly.
      - Employees with uncovered cuts or wounds or signs of illness are not allowed in production fields.
      - Chemicals are being used properly and there are no leaks or spills of any substances used in the production field.
      - Equipment used in the production field is properly sanitized, and there is no possibility of cross-contamination.

## **HANDOUT 4**

10. Issue: Field and Harvest Personnel - Transfer of Human Pathogens by Workers (Field Sanitation)

Lettuce/leafy greens are handled by harvest crews during harvest in that each lettuce/leafy greens plant is touched/handled as part of the harvest process. It is possible that persons working with produce in the field may transfer microorganisms of significant public health concern. Workers may be asymptomatic.

## 10.1 The Best Practices Are:

- Use appropriate preventive measures outlined in GAPs such as training in appropriate and effective hand washing, glove use and replacement, and
  mandatory use of sanitary field latrines to reduce and control potential contamination and shall include verifiable corrective actions for any product
  potentially contaminated through non-compliance with the company's written worker practices program.
- Establish a written worker practices program (i.e., an SOP) that can be used to verify employee compliance with company food safety policy. This program shall establish the following practices for field and harvest employees as well as visitors.
  - o Prior to harvest, an individual should be designated as responsible for harvesting food safety
  - Use, storage, record keeping, and proper labeling of chemicals
  - o Training on proper sanitation and hygiene practices

- o Requirements for workers to wash their hands before beginning or returning to work
- Confinement of smoking, eating and drinking of beverages other than water to designated areas.
- Prohibitions on release of bodily fluids in field.
- Personal item storage
- A written physical hazard prevention program should be developed for leafy green products that are intended for further processing. The program must address the following:
  - Employee clothing and jewelry (head and hair restraints, aprons, gloves, visible jewelry, etc.)
  - Removal of all objects from upper pockets
  - Foreign objects in the field.
- · Establish a worker health practices program (i.e., an SOP) that address the following issues:
  - Workers with diarrhea disease or symptoms of other infectious disease are prohibited from handling fresh produce.
  - Workers with open cuts or lesions are prohibited from handling fresh produce without specific measures to prevent cross contamination of product.
  - Actions for employee to take in the event of injury or illness.
  - A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.
- A field sanitary facility program (i.e., an SOP) shall be implemented, and it should address the following issues: the number, condition, and placement of field sanitation units, the accessibility of the units to the work area, facility maintenance, facility supplies (i.e., hand soap, water, paper towels, toilet paper, etc.), facility signage, facility cleaning and servicing, and a response plan for major leaks or spills.
  - Sanitary facilities should be placed such that the location minimizes the impact from potential leaks and/or spills while allowing access for cleaning and service.
  - The location and sanitary design of toilets and hand wash facilities should be optimized to facilitate the control, reduction and elimination of human pathogens from employee hands. Evaluate the location of worker hygiene facilities to maximize accessibility and use, while minimizing the potential for the facility to serve as a source of contamination.
  - Establish the frequency of toilet and hand washing facility maintenance/sanitation.
  - o Establish equipment and supply storage and control procedures when not in use.
  - o Maintain documentation of maintenance and sanitation schedules and any remedial practices for a period of two years.

Mr. Field informed that there is a CA LGMA Technical meeting being held in on April 16, 2009. Mr. Field stated that he would assume that the document put together has been widely distributed. Mr. Mack informed that he had a document regarding possible Metrics changes from Mr. Scott Horsfall. Mr. Field informed that the handouts above were the same handouts Mr. Mack received. Ms. Scott stated that California LGMA and members may have received this information; the Arizona constituency has not seen this information until today. Ms. Scott asked how long before California accepts the proposed Metric changes. Mr. Field informed that these could be approved by April 16, 2009.

At this time, Mr. Hank Giclas joined the meeting by telephone.

Mr. Giclas stated that most of the changes were points of clarification but some of the changes need further vetting prior to approval. Mr. Giclas informed that the changes were distributed to the California Technical Subcommittee and any suggestions or comments were due by close of business on April 9, 2009, so the changes could be approved by April 16, 2009. Ms. Scott commented that she had concern with the fact that this was the first time the Arizona Technical Subcommittee had been made of the proposed changes and that Mr. Field was the one to address the changes. Ms. Scott stated she would like to get this information out to the Arizona Technical Subcommittee and have meeting regarding these changes because they may not be in the best interest or practical use by Arizona. Mr. Giclas stated that there were some points of confusion with regard to Blue/Purple Valve, that it was not stated as Blue/Purple Valve but in a rather innocuous manner. Mr. Mack quoted the current Metrics, "Water sample results and analysis

provided by the water district or provider may be utilized as records of water source testing for verification and validation audits". Mr. Giclas added that is was never directly defined.

Ms. Scott stated that Arizona does not allow the use of reused water (Purple Valve) on food crops and it would be a violation on Arizona State Statute. Ms. Scott added that it may fall under the caveat that "Arizona law supersedes any requirements in this document that may be in conflict" which is on the front page of the Arizona Metrics. Mr. Giclas stated that he will present that information at the California meeting. Mr. Giclas added that the current Metrics states "Reclaimed water shall be subject to applicable state and federal regulations and standards. Use of this water for agricultural purposes must meet the most stringent standard as defined by the following: state and federal regulation or Table 1 of this document" so the language that ties the use of reclaimed water to Arizona statues so this is jus an additional phrase for those using reclaimed water and he does not believe this poses a conflict. Mr. Duncan added that in Arizona tertiary treated reclaimed water does meet the quality standards.

Mr. Duncan asked if it is possible to be included at the earliest levels of discussion for recommendations for change or additions to the Metrics in California. Mr. Duncan added that it will give Arizona a chance to weigh in and be proactive in the process prior to acceptance of any proposed changes or additions. Mr. Giclas stated that he can absolutely loop the Arizona Technical Subcommittee just by distributing the concepts that are being discussed, engage participation in the discussions and invite feedback. Mr. Giclas stated that historically California's Technical group works through the whole idea then gets Arizona involved but believed that Mr. Duncan's idea was best.

The council has a whole continued discussion on ways to clarify a build a more efficient Metrics.

### Public Comments

Ms. Scott asked for public comments. Edgar A. Galavia with Foothill Packing, Inc asked that LGMA send out letters to sanitation companies informing them of the program requirements and goals.

# Next Meeting Date/Adjourn

vt scheduled meeting would be Thursday. July 9, 2009 at 1pm in Yuma and the meeting adjourned

at 2:35 p.m.	be I nursday, July 9, 2009 at 1pm in Yuma and the me	eeung aajour
Minutes prepared by:		
Teressa Lopez, Divisional Assistant	Date	
Minutes approved by:		
Vicki Scott, Chair	Date	